

Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

SARAH BONES, in her Personal Capacity,
and as Personal Representative of the Estate
of JOSHUA BONES, deceased; C.G., a
minor, by and through his Guardian, SARAH
BONES; and T.G., a minor, by and through
his Guardian, SARAH BONES,

Plaintiffs,

vs.

H.I.G. CAPITAL, LLC; WELLPATH;
COUNTY OF CLALLAM, WASHINGTON,
a Political Subdivision of the State of
Washington; BILL BENEDICT; DON
WENTZEL; TYLER CORTANI; LETICIA
RUBALCAVA; KRISTIN MICHELLE
PUHL; ALICIA C. LONG; EDWARD S.
BERETTA; LINSEY JANE MONAGHAN;
TAMARA VANOVER; KATHERINE E.
JONES; and JOHN DOES 1-10,

Defendants.

Case No. 2:24-cv-00110

DEFENDANTS WELLPATH LLC AND
ALICIA C. LONG'S ANSWER TO
COMPLAINT

Defendants Wellpath LLC (erroneously identified as "Wellpath") and Alicia C. Long
(collectively "Wellpath Defendants") —by and through its attorneys of record, Jonathan D.
Ballard and Ross C. Taylor of Fox Ballard PLLC—in answer to Plaintiff's Complaint, admits,
denies, and alleges as follows:

I. PARTIES

In answer to Paragraph 1, Wellpath Defendants object as scandalous the allegations referring to allegations that Joshua R. Bones was needlessly killed by Defendants' acts and omissions. To the extent a response is required, Wellpath Defendants deny the allegations. As to the remainder of the allegations, Wellpath Defendants are without sufficient knowledge or information to either admit or deny, and on that basis, denies the same.

In answer to Paragraph 2, Wellpath Defendants are without sufficient knowledge or information to either admit or deny, and on that basis, denies the same.

In answer to Paragraph 3, Wellpath Defendants are without sufficient knowledge or information to either admit or deny, and on that basis, denies the same.

In answer to Paragraph 4, Wellpath Defendants admit that it contracted to provide medical health care services at the Clallam County Jail. As to the remainder of the allegations, Wellpath Defendants object to the extent the allegations call for legal conclusions. To the extent a response is required, Wellpath Defendants are without sufficient knowledge or information to either admit or deny, and on that basis denies the same.

In answer to Paragraph 5, Wellpath Defendants are without sufficient knowledge or information to either admit or deny, and on that basis, denies the same.

In answer to Paragraph 6, Wellpath Defendants are without sufficient knowledge or information to either admit or deny, and on that basis, denies the same.

In answer to Paragraph 7, Wellpath Defendants are without sufficient knowledge or information to either admit or deny, and on that basis, denies the same.

In answer to Paragraph 8, Wellpath Defendants deny that Alicia C. Long is an employee or subcontractor of Clallam County. As to the remainder of the allegations, Wellpath Defendants are without sufficient knowledge or information to either admit or deny, and on that basis, denies the same.

In answer to Paragraph 9, Wellpath Defendants are without sufficient knowledge or information to either admit or deny, and on that basis, denies the same.

1 In answer to Paragraph 10, Wellpath Defendants object as scandalous the allegations that
2 Wellpath arose from the ashes of a separate entity. To the extent a response is required, Wellpath
3 Defendants admit that Wellpath LLC is a successor company of Correct Care Solutions. As to
4 the remainder of the allegations, Wellpath Defendants are without sufficient knowledge or
5 information to either admit or deny, and on that basis, denies the same.

6 In answer to Paragraph 11, Wellpath Defendants are without sufficient knowledge or
7 information to either admit or deny, and on that basis, denies the same.

8 In answer to Paragraph 12, Wellpath Defendants are without sufficient knowledge or
9 information to either admit or deny, and on that basis, denies the same.

10 In answer to Paragraph 13, Wellpath Defendants object as scandalous the allegations
11 referring to a body count. To the extent a response is required, Wellpath Defendants deny the
12 allegations. As to the remainder of the allegations, Wellpath Defendants are without sufficient
13 knowledge or information to either admit or deny, and on that basis, denies the same.

14 In answer to Paragraph 14, Wellpath Defendants admit that Wellpath LLC is
15 headquartered in Nashville, Tennessee. As to the remainder of the allegations, Wellpath
16 Defendants are without sufficient knowledge or information to either admit or deny, and on that
17 basis, denies the same.

18 In answer to Paragraph 15, Wellpath Defendants object as scandalous the allegations
19 referring to allegations of paying bribes to secure contracts and a related criminal conviction. To
20 the extent a response is required, Wellpath Defendants are without sufficient knowledge or
21 information to either admit or deny, and on that basis, denies the same. As to the remainder of
22 the allegations, Wellpath Defendants are without sufficient knowledge or information to either
23 admit or deny, and on that basis, denies the same.

24 In answer to Paragraph 16, Wellpath Defendants object to the allegations as scandalous.
25 To the extent a response is required, Wellpath Defendants deny the allegations.

26 In answer to Paragraph 17, Wellpath Defendants object to the allegations as scandalous.
27 To the extent a response is required, Wellpath Defendants deny the allegations.

1 In answer to Paragraph 18, Wellpath Defendants object to the allegations as scandalous.
2 To the extent a response is required, Wellpath Defendants deny the allegations.

3 In answer to Paragraph 19, Wellpath Defendants are without sufficient knowledge or
4 information to either admit or deny, and on that basis, denies the same.

5 In answer to Paragraph 20, Wellpath Defendants deny that unconstitutional practices,
6 customs, and policies in Clallam County resulted in Mr. Bones' death. As to the remainder of the
7 allegations, Wellpath Defendants are without sufficient knowledge or information to either admit
8 or deny, and on that basis, denies the same.

9 In answer to Paragraph 21, Wellpath Defendants deny the allegations.

10 In answer to Paragraph 22, Wellpath Defendants deny the allegations.

11 In answer to Paragraph 23, Wellpath Defendants deny the allegations.

12 In answer to Paragraph 24, Wellpath Defendants deny the allegations.

13 In answer to Paragraph 25, Wellpath Defendants are without sufficient knowledge or
14 information to either admit or deny, and on that basis, denies the same.

15 In answer to Paragraph 26, Wellpath Defendants are without sufficient knowledge or
16 information to either admit or deny, and on that basis, denies the same.

17 In answer to Paragraph 27, Wellpath Defendants are without sufficient knowledge or
18 information to either admit or deny, and on that basis, denies the same.

19 In answer to Paragraph 28, Wellpath Defendants are without sufficient knowledge or
20 information to either admit or deny, and on that basis, denies the same.

21 In answer to Paragraph 29, Wellpath Defendants deny unconstitutional conduct,
22 practices, customs, and policies causing harm. As to the remainder of the allegations, Wellpath
23 Defendants are without sufficient knowledge or information to either admit or deny, and on that
24 basis, denies the same.

25 In answer to Paragraph 30, Wellpath Defendants object to the extent the allegations call
26 for legal conclusions. To the extent a response is required, Wellpath Defendants are without
27 sufficient knowledge or information to either admit or deny, and on that basis denies the same.

1 In answer to Paragraph 31, Wellpath Defendants admit that it contracted to provide
2 medical health care services at the Clallam County Jail. As to the remainder of the allegations,
3 Wellpath Defendants deny the allegations.

4 In answer to Paragraph 32, Wellpath Defendants object to the extent the allegations call
5 for legal conclusions. To the extent a response is required, Wellpath Defendants deny the
6 allegations.

7 In answer to Paragraph 33, Wellpath Defendants deny the allegations.

8 In answer to Paragraph 34, Wellpath Defendants deny the allegations.

9 In answer to Paragraph 35, Wellpath Defendants deny the allegations.

10 In answer to Paragraph 36, Wellpath Defendants deny the allegations.

11 In answer to Paragraph 37, Wellpath Defendants are without sufficient knowledge or
12 information to either admit or deny, and on that basis, denies the same.

13 In answer to Paragraph 38, Wellpath Defendants deny the allegations.

14 In answer to Paragraph 39, Wellpath Defendants deny unconstitutional actions and
15 inactions causing harm. As to the remainder of the allegations, Wellpath Defendants are without
16 sufficient knowledge or information to either admit or deny, and on that basis, denies the same.

17 In answer to Paragraph 40, Wellpath Defendants are without sufficient knowledge or
18 information to either admit or deny, and on that basis, denies the same.

19 In answer to Paragraph 41, Wellpath Defendants are without sufficient knowledge or
20 information to either admit or deny, and on that basis, denies the same.

21 **II. JURISDICTION AND VENUE**

22 In answer to Paragraph 42, Wellpath Defendants are without sufficient knowledge or
23 information to either admit or deny, and on that basis, denies the same.

24 In answer to Paragraph 43, Wellpath Defendants are without sufficient knowledge or
25 information to either admit or deny, and on that basis, denies the same.

26 In answer to Paragraph 44, Wellpath Defendants object to the extent the allegations call
27 for legal conclusions. To the extent a response is required, Wellpath Defendants do not object

1 to jurisdiction and venue in the United States District Court for the Western District. As to any
2 remaining allegations, Wellpath Defendants deny the allegations.

3 **III. FACTS**

4 In answer to Paragraph 45, Wellpath Defendants deny the allegations.

5 In answer to Paragraph 46, Wellpath Defendants are without sufficient knowledge or
6 information to either admit or deny, and on that basis, denies the same.

7 In answer to Paragraph 47, Wellpath Defendants are without sufficient knowledge or
8 information to either admit or deny, and on that basis, denies the same.

9 In answer to Paragraph 48, Wellpath Defendants are without sufficient knowledge or
10 information to either admit or deny, and on that basis, denies the same.

11 In answer to Paragraph 49, Wellpath Defendants are without sufficient knowledge or
12 information to either admit or deny, and on that basis, denies the same.

13 In answer to Paragraph 50, Wellpath Defendants are without sufficient knowledge or
14 information to either admit or deny, and on that basis, denies the same.

15 In answer to Paragraph 51, Wellpath Defendants are without sufficient knowledge or
16 information to either admit or deny, and on that basis, denies the same.

17 In answer to Paragraph 52, Wellpath Defendants are without sufficient knowledge or
18 information to either admit or deny, and on that basis, denies the same.

19 In answer to Paragraph 53, Wellpath Defendants are without sufficient knowledge or
20 information to either admit or deny, and on that basis, denies the same.

21 In answer to Paragraph 54, Wellpath Defendants are without sufficient knowledge or
22 information to either admit or deny, and on that basis, denies the same.

23 In answer to Paragraph 55, Wellpath Defendants are without sufficient knowledge or
24 information to either admit or deny, and on that basis, denies the same.

25 In answer to Paragraph 56, Wellpath Defendants are without sufficient knowledge or
26 information to either admit or deny, and on that basis, denies the same.

1 In answer to Paragraph 57, Wellpath Defendants deny that Defendant Rubalcava was an
2 employee of Wellpath LLC. As to the remainder of the allegations, Wellpath Defendants are
3 without sufficient knowledge or information to either admit or deny, and on that basis, denies the
4 same.

5 In answer to Paragraph 58, Wellpath Defendants are without sufficient knowledge or
6 information to either admit or deny, and on that basis, denies the same.

7 In answer to Paragraph 59, Wellpath Defendants are without sufficient knowledge or
8 information to either admit or deny, and on that basis, denies the same.

9 In answer to Paragraph 60, Wellpath Defendants are without sufficient knowledge or
10 information to either admit or deny, and on that basis, denies the same.

11 In answer to Paragraph 61, Wellpath Defendants are without sufficient knowledge or
12 information to either admit or deny, and on that basis, denies the same.

13 In answer to Paragraph 62, Wellpath Defendants are without sufficient knowledge or
14 information to either admit or deny, and on that basis, denies the same.

15 In answer to Paragraph 63, Wellpath Defendants admit that Defendant Long was an
16 employee of Wellpath LLC on October 31, 2022. As to the remainder of the allegations, Wellpath
17 Defendants are without sufficient knowledge or information to either admit or deny, and on that
18 basis, denies the same.

19 In answer to Paragraph 64, Wellpath Defendants are without sufficient knowledge or
20 information to either admit or deny, and on that basis, denies the same.

21 In answer to Paragraph 65, Wellpath Defendants are without sufficient knowledge or
22 information to either admit or deny, and on that basis, denies the same.

23 In answer to Paragraph 66, Wellpath Defendants deny the allegations.

24 In answer to Paragraph 67, Wellpath Defendants are without sufficient knowledge or
25 information to either admit or deny, and on that basis, denies the same.

26 In answer to Paragraph 68, Wellpath Defendants are without sufficient knowledge or
27 information to either admit or deny, and on that basis, denies the same.

1 In answer to Paragraph 69, Wellpath Defendants are without sufficient knowledge or
2 information to either admit or deny, and on that basis, denies the same.

3 In answer to Paragraph 70, Wellpath Defendants are without sufficient knowledge or
4 information to either admit or deny, and on that basis, denies the same.

5 In answer to Paragraph 71, Wellpath Defendants are without sufficient knowledge or
6 information to either admit or deny, and on that basis, denies the same.

7 In answer to Paragraph 25 [sic 72], Wellpath Defendants are without sufficient
8 knowledge or information to either admit or deny, and on that basis, denies the same.

9 In answer to Paragraph 26 [sic 73], Wellpath Defendants deny the allegations.

10 In answer to Paragraph 27 [sic 74], Wellpath Defendants deny the allegations.

11 In answer to Paragraph 28 [sic 75], Wellpath Defendants deny the allegations.

12 In answer to Paragraph 29 [sic 76], Wellpath Defendants deny the allegations.

13 In answer to Paragraph 30 [sic 77], Wellpath Defendants are without sufficient
14 knowledge or information to either admit or deny, and on that basis, denies the same.

15 In answer to Paragraph 31 [sic 78], Wellpath Defendants are without sufficient
16 knowledge or information to either admit or deny, and on that basis, denies the same.

17 In answer to Paragraph 32 [sic 79], Wellpath Defendants deny the allegations.

18 In answer to Paragraph 33 [sic 80], Wellpath Defendants deny the allegations.

19 In answer to Paragraph 34 [sic 81], Wellpath Defendants deny the allegations.

20 In answer to Paragraph 35 [sic 82], Wellpath Defendants deny the allegations.

21 In answer to Paragraph 36 [sic 83], Wellpath Defendants deny the allegations.

22 In answer to Paragraph 37 [sic 84], Wellpath Defendants deny the allegations.

23 In answer to Paragraph 38 [sic 85], Wellpath Defendants deny the allegations.

24 In answer to Paragraph 39 [sic 86], Wellpath Defendants deny the allegations.

25 In answer to Paragraph 40 [sic 87], Wellpath Defendants deny the allegations.

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IV. FIRST CAUSE OF ACTION – NEGLIGENCE

In answer to Paragraph 41 [sic 88], Wellpath Defendants object to the extent the allegations call for legal conclusions. To the extent a response is required, Wellpath Defendants deny Plaintiff's characterization of duty. As to any remaining allegations, Wellpath Defendants are without sufficient knowledge or information to either admit or deny, and on that basis denies the same.

In answer to Paragraph 42 [sic 89], Wellpath Defendants object to the extent the allegations call for legal conclusions. To the extent a response is required, Wellpath Defendants deny Plaintiff's characterization of duty. As to any remaining allegations, Wellpath Defendants are without sufficient knowledge or information to either admit or deny, and on that basis denies the same.

In answer to Paragraph 43 [sic 90], Wellpath Defendants object to the extent the allegations call for legal conclusions. To the extent a response is required, Wellpath Defendants deny Plaintiff's characterization of duty. As to any remaining allegations, Wellpath Defendants are without sufficient knowledge or information to either admit or deny, and on that basis denies the same.

In answer to Paragraph 44 [sic 91], Wellpath Defendants deny the allegations.

In answer to Paragraph 45 [sic 92], Wellpath Defendants deny the allegations.

In answer to Paragraph 46 [sic 93], Wellpath Defendants deny the allegations.

In answer to Paragraph 47 [sic 94], Wellpath Defendants deny the allegations.

In answer to Paragraph 48 [sic 95], Wellpath Defendants deny the allegations.

In answer to Paragraph 49 [sic 96], Wellpath Defendants deny the allegations.

In answer to Paragraph 50 [sic 97], Wellpath Defendants deny the allegations.

In answer to Paragraph 51 [sic 98], Wellpath Defendants deny the allegations.

In answer to Paragraph 52 [sic 99], Wellpath Defendants deny the allegations.

In answer to Paragraph 53 [sic 100], Wellpath Defendants deny the allegations.

1 In answer to Paragraph 54 [sic 101], Wellpath Defendants object to the extent the
 2 allegations call for legal conclusions. To the extent a response is required, Wellpath Defendants
 3 deny Plaintiff's characterization of duty. As to any remaining allegations, Wellpath Defendants
 4 are without sufficient knowledge or information to either admit or deny, and on that basis denies
 5 the same.

6 **V. SECOND CAUSE OF ACTION – 42 U.S.C. § 1983**

7 In answer to Paragraph 55 [sic 102], Wellpath Defendants deny the allegations.

8 In answer to Paragraph 56 [sic 103], Wellpath Defendants object to the extent the
 9 allegations call for legal conclusions. To the extent a response is required, Wellpath Defendants
 10 are without sufficient knowledge or information to either admit or deny, and on that basis denies
 11 the same.

12 In answer to Paragraph 57 [sic 104], Wellpath Defendants are without sufficient
 13 knowledge or information to either admit or deny, and on that basis, denies the same.

14 In answer to Paragraph 58 [sic 105], Wellpath Defendants deny the allegations.

15 In answer to Paragraph 59 [sic 106], Wellpath Defendants deny the allegations.

16 In answer to Paragraph 60 [sic 107], Wellpath Defendants deny the allegations.

17 In answer to Paragraph 61 [sic 108], Wellpath Defendants deny the allegations.

18 In answer to Paragraph 62 [sic 109], Wellpath Defendants deny the allegations.

19 In answer to Paragraph 63 [sic 110], Wellpath Defendants deny the allegations.

20 In answer to Paragraph 64 [sic 111], Wellpath Defendants deny the allegations.

21 In answer to Paragraph 65 [sic 112], Wellpath Defendants deny the allegations.

22 In answer to Paragraph 66 [sic 113], Wellpath Defendants deny the allegations.

23 In answer to Paragraph 67 [sic 114], Wellpath Defendants deny the allegations.

24 **VI. THIRD CAUSE OF ACTION – 42 U.S.C. § 1983**

25 In answer to Paragraph 68 [sic 115], Wellpath Defendants refer to and incorporates its
 26 responses to the preceding paragraphs.

1 In answer to Paragraph 69 [sic 116], Wellpath Defendants object to the extent the
 2 allegations call for legal conclusions. To the extent a response is required, Wellpath Defendants
 3 are without sufficient knowledge or information to either admit or deny, and on that basis denies
 4 the same.

5 In answer to Paragraph 70 [sic 117], Wellpath Defendants object to the extent the
 6 allegations call for legal conclusions. To the extent a response is required, Wellpath Defendants
 7 are without sufficient knowledge or information to either admit or deny, and on that basis denies
 8 the same.

9 In answer to Paragraph 71 [sic 118], Wellpath Defendants are without sufficient
 10 knowledge or information to either admit or deny, and on that basis, denies the same.

11 **VI. JURY DEMAND**

12 This section of Plaintiff's Complaint is a jury demand, to which no response is required.
 13 To the extent a response is required, Wellpath Defendants demand a jury.

14 **VII. PLAINTIFF'S PRAYER FOR RELIEF**

15 This section of Plaintiff's Complaint is a request for relief, to which no response is
 16 required. To the extent a response is required, Wellpath Defendants deny Plaintiffs are entitled
 17 to relief.

18 **VIII. AFFIRMATIVE DEFENSES**

19 By way of further answer and by way of affirmative defense, Wellpath Defendants alleges
 20 and states as follows:

21 **FIRST AFFIRMATIVE DEFENSE**

22 Plaintiff's Complaint and each and every cause of action purported to be set forth therein,
 23 fails to allege facts sufficient to state a claim against Wellpath Defendants upon which relief can
 24 be granted.

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SECOND AFFIRMATIVE DEFENSE

The incident involved herein and any resulting injuries or damages, if any, were caused or contributed by acts and/or omissions of third parties over whom Wellpath Defendants had no control.

THIRD AFFIRMATIVE DEFENSE

Plaintiffs' claim is barred or should be reduced according to the principles of comparative fault.

FOURTH AFFIRMATIVE DEFENSE

Plaintiffs failed to mitigate their damages, if any.

FIFTH AFFIRMATIVE DEFENSE

Plaintiff's alleged damages were not proximately caused by an act or omission of Wellpath Defendants.

SIXTH AFFIRMATIVE DEFENSE

Plaintiff's damages, if any, were caused by an intervening superseding cause.

SEVENTH AFFIRMATIVE DEFENSE

Wellpath Defendants are entitled to qualified immunity.

EIGHTH AFFIRMATIVE DEFENSE

At all material times herein, Wellpath Defendants acted in good faith in its performance of its duties and is, therefore, immune from suit.

IX. RESERVATION OF RIGHTS

All possible affirmative defenses may not have been alleged herein, insofar as sufficient facts were not available after reasonable inquiry upon the filing of Wellpath Defendants' Answer and, therefore, Wellpath Defendants reserve the right to amend its Answer to allege additional affirmative defenses if subsequent investigation so warrants.

X. PRAYER FOR RELIEF

WHEREFORE, having fully answered Plaintiff's Complaint, Wellpath Defendants request relief as follows:

1. Dismissal of Plaintiff's Complaint with prejudice;
2. That Plaintiffs recover nothing by way of their Complaint;
3. An award of attorney fees and costs to the extent allowed by law; and,
4. For such further and other relief as this Court deems just and equitable.

DATED this Thursday, February 29, 2024.

FOX BALLARD PLLC

By: 

Jonathan D. Ballard, WSBA No. 48870

Ross C. Taylor, WSBA No. 48111

Attorneys for Wellpath LLC and Alicia C.
Long

DECLARATION OF SERVICE

I hereby declare under penalty of perjury under the laws of the State of Washington that I caused a true and correct copy of the foregoing **DEFENDANTS WELLPATH LLC AND ALICIA C. LONG'S ANSWER TO COMPLAINT** to be served via the methods below on this Thursday, February 29, 2024, on the following counsel/party of record:

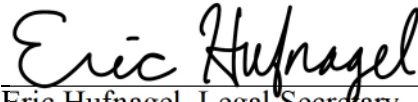
<p>Joseph Schodowski, WSBA # 42910 Schodowski Law, Inc, PS 210 Polk Street, Suite 8 Port Townsend, WA 98368</p> <p>Ryan D. Dreveskracht, WSBA # 42593 Galanda Broadman, PLLC P.O. Box 15146 Seattle, WA 98115</p> <p><i>Attorneys for Plaintiff</i></p>	<p><input type="checkbox"/> via U.S. Mail, first class, postage</p> <p><input type="checkbox"/> via Legal Messenger Hand Delivery</p> <p><input type="checkbox"/> via Facsimile</p> <p><input checked="" type="checkbox"/> via E-Service</p> <p><input type="checkbox"/> via E-mail: joe@schodowskilaw.com rebecca@schodowskilaw.com ryan@galandabroadman.com</p>
<p>John E. Justice, WSBA # 23042 Law, Lyman, Daniel, Kamerrer & Bogdanovich, P.S. P.O. Box 11880, Olympia, WA 98508</p> <p><i>Attorney for Defendants Clallam County, Bill Benedict, Don Wenzl, Tyler Cortani, Kristin Michelle Puhl, Edward S. Berretta, Lindsay Jane Monaghan, and Tamara Vanover</i></p>	<p><input type="checkbox"/> via U.S. Mail, first class, postage</p> <p><input type="checkbox"/> via Legal Messenger Hand Delivery</p> <p><input type="checkbox"/> via Facsimile</p> <p><input checked="" type="checkbox"/> via E-Service</p> <p><input type="checkbox"/> via E-mail: jjustice@lldkb.com lisa@lldkb.com tam@lldkb.com tmonroe@lldkb.com</p>
<p>Robert L. Bowman, WSBA # 40079 Samantha K. Pitsch, WSBA # 54190 Stokes Lawrence, P.S. 1420 Fifth Avenue, Suite 3000 Seattle, WA 98101-2393</p> <p><i>Attorneys for Defendant H.I.G. Capital, LLC</i></p>	<p><input type="checkbox"/> via U.S. Mail, first class, postage</p> <p><input type="checkbox"/> via Legal Messenger Hand Delivery</p> <p><input type="checkbox"/> via Facsimile</p> <p><input checked="" type="checkbox"/> via E-Service</p> <p><input type="checkbox"/> via E-mail: robert.bowman@stokeslaw.com samantha.pitsch@stokeslaw.com</p>

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Signed at Seattle, WA on this Thursday, February 29, 2024.



Eric Hufnagel, Legal Secretary
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